

January 11, 2016

United States Environmental Protection Agency  
Region 6  
Fountain Place, 12<sup>th</sup> Floor, Suite 1200  
1445 Ross Avenue  
Dallas, TX 75202-2733

**VIA CERTIFIED MAIL**  
**RETURN RECEIPT REQUESTED**

RE: Williams Gas Plant, Gibson, LA  
Incident on October 8, 2015  
Freedom of Information Act Request  
KM File No. 14863-288

Dear Sir or Madam:

Please allow this letter to serve as a request pursuant to the Freedom of Information Act, for a certified copy of the following documents from the United States Environmental Protection Agency, including, but not limited to the following:

Any and all public records, including computerized or electronically stored data, in any way related to an incident which occurred on October 8, 2015 at the Williams Gas Plant in Gibson, LA located at 4711 Bayou Black Road, Gibson, LA., including, but not limited to:

1. Any and all records related in any way to testing, monitoring or sampling of any sort which was conducted as part of the response to the Incident or which may reflect the level of airborne contaminants associated with the Incident;
2. Any and all records related in any way to the meteorological conditions existing at the time of the Incident or during any part of the response thereto, including any information on wind direction and speed or temperature;
3. Any and all public records reflecting the identify of any witnesses to any aspect of the Incident, including any personnel involved in any manner with the response to the Incident;
4. Any and all public records related to or reflecting the content of any interviews with or statements by any witnesses to any aspect of the Incident, the response thereto or the alleged results thereof;
5. Any and all public records related to or reflecting the content of any communications by or between any public agencies or entities involved in any aspect of the response to the Incident

and/or Williams or its officers, employees, agents or representatives and/or private persons or entities invoiced in any aspect of the Incident or the response to the Incident, including any contractors or subcontractors and/or member of the public.

6. Any and all reports, draft reports, logs, field books or notes of any form by any personnel involved in any manner with the Incident or the response thereto;

7. Any and all public records which provide the names and/or addresses and/or phone numbers and/or job descriptions (including duties at the time of the Incident or the response thereto) of any and all personnel involved in the Incident or the response thereto;

8. Any and all photographs, videotapes, audio records, computer records, drawings, maps, plats or plans related in any manner to the Incident or the response thereto;

9. Any and all records, data, papers, documents or other materials obtained from any person or entity, however obtained, and related to the Incident or the response thereto;

10. Any and all public records related to the costs and/or expenses incurred by any public agency or entity which are alleged to be a result of or associated with the Incident or the response thereto; and


11. Any and all public records which relate in any way to the decision making process by which the manner of responding to the Incident was determined, including, but not limited to, any guidelines, criteria, standards or specifications that were relied upon as part of the response to the Incident.

Please provide the records at your earliest convenience. If there are questions as to whether the requested records are considered public records, please notify me in writing of the legal basis for withholding these documents. Likewise, if the records are not immediately available, please let me know when the records can be made available.

Should you have any questions, please feel free to contact me. With best regards, I am,

Sincerely,

**KEAN MILLER LLP**



Beverly Creech-Chauvin  
Paralegal

BCC:jmm